



# FIRE-DEPENDENT ECOSYSTEM RESTORATION PROJECT

Chippewa National Forest

January | 2022

This letter shares information about the proposed **Fire-Dependent Ecosystem Restoration Project** on the Chippewa National Forest (Forest). The Forest Service, with Leech Lake Band of Ojibwe as a Cooperating Agency, is proposing to restore fire-dependent ecosystems and associated wildlife habitat and cultural resources and uses throughout a portion of the Forest which is completely within the proclamation boundary of the Leech Lake Band of Ojibwe Reservation. Restoration activities may include prescribed burning, fire control lines construction, mechanical or hand treatments, planting, seeding, and canopy removal through harvest.

More detailed information about the project is included in the following sections and additional information is available on the Forest's project website: <https://www.fs.usda.gov/project/?project=59126>.

## BACKGROUND

- Fire-dependent ecosystems developed in the region over hundreds of years with fire as a regularly occurring process. This process ended during the 20<sup>th</sup> century when fire suppression began.
- Fire suppression results in denser canopies, sub-canopies, and shrub layers; organic matter accumulating at the forest floor; and fire-intolerant vegetation taking hold.
- The lack of fire impacts several Regional Forester Sensitive Species that occur within habitats sustained by this ecosystem process.
- The lack of fire impacts tribal cultural resources, uses, ways of life. Reintroduction of fire will benefit habitats that support Leech Lake Band of Ojibwe listed Threatened, endangered and sensitive species.
- The Chippewa National Forest Land and Resource Management Plan direction states that a forest-wide desired condition for fire as a disturbance process be "present on the landscape, restoring or maintaining desirable attributes, processes, and functions of natural communities.

## HOW TO COMMENT

There are several ways to submit comments:

1. Submit your comments electronically in a common file format (.doc, .docx, .pdf, .rtf, .txt) to: [comments-eastern-chippewa@usda.gov](mailto:comments-eastern-chippewa@usda.gov) with the subject line "Fire-Dependent Restoration Project". Please include your name, address, telephone number, and the title of the project with your comments.
2. Mail your comments to the Chippewa National Forest Supervisor's Office:  
Attn: Christopher Worthington  
200 Ash Avenue NW  
Cass Lake, MN 56633
3. Submit your comments by fax to:  
(218)-335-8641

For additional information, please contact Christopher Worthington, Forest Planner at: 218-335-8643 or [christopher.worthington@usda.gov](mailto:christopher.worthington@usda.gov)

**We request you submit comments by:  
February 22, 2022**



## BACKGROUND (CONTINUED FROM PAGE 1)

- The amount and frequency of fire and/or restoration treatments is insufficient to maintain these desired natural conditions at an appreciable scale.
- Conditions that have developed in these communities over a century of fire absence may not be restored by the short-term restoration of fire as an ecosystem process alone. Complementary treatments of burning, thinning, and/or seeding are needed to increase understory light levels and re-establish diverse native fire-dependent plant communities.
- Additional benefits of maintaining or re-establishing fire-dependent land types include reducing the risk to communities from hazardous fuels, and benefits for ongoing vegetation management that will increase the health and resilience of forested areas.



- **Figure 1. a.** Prescribed fire under burning. **b.** Mechanical reduction of hazel shrub layer by brushsaw **c.** *Botrychium campestre*, a Regional Forester Sensitive Species that occurs in fire-dependent ecosystems.

## PROPOSED ACTION

This project would use upland and wetland prescribed fire and associated activities to restore fire as an ecosystem process, move vegetative composition and structure toward desired conditions, and increase resiliency of fire-dependent ecosystems, as well as associated wildlife habitat and cultural resources, while considering adaptations for climate change.

The proposed action includes prescribed fire as well as fireline construction where natural features or existing barriers are not already available. In addition, where the prolonged absence of fire has resulted with uncharacteristically dense vegetation, such as a continuous cover of hazel in the understory, a prescribed fire alone might not be sufficient to restore the structure and diversity of the ecosystem. Complementary actions may be needed, such as mechanical treatments that remove woody understory vegetation and/or canopies, to restore a desirable stand structure.

Where stand structure is restored and ecosystem diversity is still lacking because of the prolonged absence of fire and the depletion of a viable seedbank, additional seeding and/or planting may occur to increase the cover and diversity of the forest ground layer. A detailed proposed action document is available on the project website (<https://www.fs.usda.gov/project/?project=59126>) that includes an Existing Condition Assessment; tables outlining the range of desired disturbance regimes, desired stand structure, and desired composition of ground-layer plant communities; and a Treatment Guide identifying management actions that could be taken to address differences between the existing and desired conditions.

The proposed project would authorize multiple restoration treatments across national forest system lands within the Leech Lake Band of Ojibwe Reservation. Individual treatment units would typically range from 10-

500 acres in size. The aim of this project is to increase the acres restored each year over the next 15 years. The actual amount of restoration treatments would depend on budget, resources, capacity, and availability of appropriate burn windows.

Each year, when fully implemented, it is anticipated that individual restoration activities developed under this project would be near to the average annual acreage amounts presented in **Error! Reference source not found..**

The acreage where these actions occur may fluctuate each year depending on forest conditions and operational capacity but would not exceed the maximum 15-year acreage through the lifespan of this project. These acres are approximations and are provided to demonstrate the proportions of treatment activities. All activities would be completed within the guidance and sideboards set forth in the Design Elements, and Operational Standards and Guidelines (OSGs), and Implementation Plan which are the other components of the proposed action. Design Elements developed by resource specialists to conserve resources are integrated into the implementation of this project and are included within the detailed proposed action document provided on the project website.

*Table 1: Proposed activities, annual average acres and total acres limit for 15 years*

Activity	Average Acres Per Year (1)	Acres in 15 years
<b>Wetland prescribed burning</b>	2,500	37,500
<b>Upland prescribed burning</b>	1,500	22,500
<b>Mechanical treatment</b>	500	7,500
<b>Canopy removal</b>	300	4,500
<b>Planting/seeding</b>	200	3,000
<b>Fire control lines</b>	4	60

A conditions-based management approach will be utilized that increases responsiveness to changing conditions and needs over time. Condition based management is a planning and implementation method which allows for selecting treatments that respond to current resource conditions. It is a flexible approach that allows us to prepare a broad framework for management activities, but then allows managers to put the right treatment on the right acre at the right time.

This conditions-based management approach seeks to remedy deficiencies from traditional management approaches which have not been able to adequately address the desired condition for presenting fire as a landscape scale disturbance process. Past restoration management planning processes, including the use of prescribed fire, on the CNF include selection of individual stands to treat identified during the NEPA process and decision on relatively small project areas. This approach contains several drawbacks such as:

- Stand conditions can change in the time between planning and implementation.
- This approach limits the ability to collaborate on treatments with other land managers or interested organizations.
- Not enough staff time and resources are spent on public engagement, treatment design, implementation, and inventory and monitoring on the ground.
- The 2016-2017 Monitoring and Evaluation Report shows that the Forest is falling farther behind in achieving multiple landscape ecosystem objectives after 15 years of implementing this traditional approach.

These issues along with other challenges such as funding, staffing and operator capacity are contributing to the reality that the Forest is not keeping pace with the needs identified in Monitoring and Evaluation Report.

Therefore, a different planning approach is needed to address challenges and opportunities presented by forest conditions compared to Forest Plan objectives.

In contrast, for this project, using the condition-based management approach, the selection of specific stands and treatments would be done during implementation based on current resource conditions, in accordance with the detailed proposed action. This will allow for the proposed action to continually focus on areas with the greatest need for restorative actions and respond to changing conditions, allowing managers the flexibility to select the most effective treatment for moving towards desired conditions. For example, respond to the discovery of sensitive species populations or the vegetative response to ongoing land management activities from other projects.

We are proposing to use prescribed burning and other treatments within and adjacent to fire-dependent land types within the project boundary wherever they occur and where they need restoration to meet our desired conditions. While we have identified the fire-dependent land type areas based on current geospatial data available (Figure 3), specific conditions on the ground may differ from mapped conditions. Treatments would be tailored to respond to resource conditions at the time of implementation. The detailed proposed action (available on the project website) describes how to determine the land type or fire-tolerance to aid in determining which community characteristics are desired. It also describes the restoration treatment options that would be proposed depending on the location-specific conditions.



**Figure 2.** a. Woody encroachment of a wet meadow b. Prescribed burning to promote herbaceous cover c. Yellow rail, a Regional Forester Sensitive Species that occupies wet meadows; increasing shrub density reduces habitat suitability

An Implementation Guide would be followed prior to implementing the proposed action to coordinate implementation by the Forest Service and Leech Lake Band of Ojibwe staff. This checklist broadly ensures that the interdisciplinary team and responsible official would select areas for prescribed fire (and for other treatment activities such as fire line construction), apply the project design features, and implement the activities consistent with the project Decision. The steps include ongoing Tribal and regulatory agency consultation, public notification, outfitter and guide camps and operating areas, resorts, recreation events, etc.), and preparation and approval of burn plan(s) consistent with Interagency Prescribed Fire Planning and Implementation Procedures Guide.

**For a more detailed description of the purpose of the project and proposed action, which describes the set of restoration treatment options that would be proposed depending on management area, forest ecosystem grouping, and resource condition, visit the project website: <https://www.fs.usda.gov/project/?project=59126>** To receive a printed copy of this document, reach out to the project contact listed on page 1.

This project has been developed to respond to desired conditions and needs defined by the following. The specific goals and desired conditions are described in more detail in the proposed action document, available on the project website.

- *The 2004 Chippewa National Forest and Resource Management Plan (Forest Plan)<sup>1</sup>;*
- *the fiduciary responsibility of the USDA Forest Service to protect and enhance resources on National Forest System lands within Reservation boundaries under the Leech Lake Band of Ojibwe's usufructuary Treaty Rights of hunting, fishing, and gathering;*
- *the October 4, 2019, Memorandum of Understanding between the USDA Forest Service, Chippewa National Forest, and the Leech Lake Band of Ojibwe of the Minnesota Chippewa Tribe; and,*
- *the 2020 Tribal Forest Protection Act request submitted by Leech Lake Band of Ojibwe, regarding fire dependent stands and climate change.*

## PROJECT LOCATION

The project analysis area is on the Chippewa National Forest within Beltrami, Cass, and Itasca Counties, Minnesota, and completely within the proclamation boundary of the Leech Lake Band of Ojibwe Reservation. The boundary includes approximately 778,000 acres, including 291,000 acres of National Forest System lands. Within the analysis area there are approximately 150,000 acres of National Forest System lands that are classified as fire-dependent ecosystems, which would be the priority for treatment. The proposed activities could occur throughout the project area and the specific locations of prescribed fire and mechanical treatments would be determined closer to implementation.

Figure 3 shows all the fire-dependent ecosystems (land types) within the analysis area regardless of ownership. While this proposed action applies to national forest system lands only, Leech Lake Band of Ojibwe, State, or counties could elect to burn their adjacent fire-dependent lands concurrently with their own crews.

## ENVIRONMENTAL ANALYSIS PROCESS

At this time, it is anticipated that this project can be categorically excluded from documentation in an environmental assessment or environmental impact statement because the activities proposed are consistent with the following category: *timber stand and wildlife habitat improvement projects that do not include the use of herbicides and or do not require more than 1 mile of low standard road construction.* (36 CFR 220.6(e)(6)) because the proposal would improve vegetation conditions and wildlife habitat in fire-dependent ecosystems.

The project has been developed consistent with the Forest Plan and relevant law, regulation, and policy. In addition, based on our preliminary analysis we do not expect that the project would result in any extraordinary circumstances due to project design. The interdisciplinary team reviewed the resource conditions listed at 36 in FSH 1909.15 Chapter 30 (31.2) and other concerns applicable to this project to determine potential for extraordinary circumstances and thus suitability for categorical exclusion. The mere presence of one or more resource conditions does not preclude use of a categorical exclusion. It is the existence of a cause-effect relationship between a proposed action and the potential effect on these resource conditions and if such a relationship exists, the degree of potential effect determines whether extraordinary circumstances exist. Resource specialists have completed a preliminary environmental effects review to help inform the responsible official and the public of potential environmental effects from this proposal.

---

<sup>1</sup> Available at: <https://www.fs.usda.gov/main/chippewa/landmanagement/planning>

Specialist reports determining the cause-effect relationship between the proposed action and resource conditions will be finalized before the Responsible Official reaches a decision. The final determination of the degree of the potential effect of the proposed action on the resource conditions will be disclosed in the Decision Memo. However, due to the routine nature of the actions proposed and the years of experience implementing projects of a similar nature, we do not expect these preliminary findings to change significantly, if at all, between now and the final decision.

The rationale for this determination is provided below:

- The project would not take place within or with proximity to congressionally designated wilderness, wilderness study areas, inventoried roadless areas or other designated areas.
- One Research Natural Area (RNA) and one candidate RNA are within the project boundary and contain fire-dependent land types proposed for treatment: Pine Point RNA (1,152 acres) and Sunken Lake candidate RNA (590 acres). According to the Forest Plan, prescribed fire or other deliberate manipulation may be used, in limited situations, to maintain the ecosystem or unique features for which the RNA was established or to reestablish natural ecological processes (D-RNA-2, Forest Plan page 3-36). Treatment within the RNA would be consistent with the Forest Plan.
- Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, Leech Lake Band of Ojibwe listed threatened, endangered, and sensitive species, and Forest Service sensitive species have been considered in the design of the project and project design elements are included to minimize any adverse effects to these species. The project would benefit certain wildlife or plants. Detailed analysis will be prepared, consultation with the US Fish and Wildlife Service would be conducted, as appropriate, and findings described in the Decision Memorandum.
- Native American religious or cultural sites, archeological sites, and historic properties or areas would be protected using design elements.
- Flood plains, wetlands, and municipal watersheds may occur within the analysis area and would be protected by design elements and best management practices for protecting water quality.

More detailed analysis will be prepared to verify these preliminary findings and documented in a Decision Memorandum which will be provided to all interested parties.

Projects that are categorically excluded are not subject to Forest Service administrative review regulations (36 CFR 218).

## **HOW YOU CAN GET INVOLVED**

See the first page of this document for information on how to submit comments. The input you and others provide during this comment period will help the Responsible Official to determine issues to focus on during the analysis, or to develop an alternative way to meet the need for the project. Comments that provide relevant and new information with sufficient detail and rationale are the most useful. Please note that this will be the only opportunity to provide formal comments on this project prior to the decision being made, however, future opportunities for engagement are planned during implementation. Feedback from comments will also help the Responsible Official to know who is interested in being kept up to date on the project in the future, during project implementation.

After a final decision has been made for this project, an inter-disciplinary team will monitor developing forest conditions and propose site-specific opportunities to restore fire-dependent ecosystems. Proposed site-specific locations for implementation of the proposed actions of this project would be made public annually.

It is anticipated that annual notifications would occur during the winter, with treatment areas finalized no later than May. At that time, the public will be invited to provide any new information or changed circumstances that may concern a proposed site-specific location.

New information or changed circumstances presented would be considered by the responsible official to determine whether the treatments would remain within the scope and range of effects from the original analysis as proposed; would require modification; or whether a correction, supplement, or revision to environmental documentation would be needed.

Please note that all comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record and will be available for public inspection.

Thank you for your interest in your Chippewa National Forest. We look forward to hearing from you.

Sincerely,



January 21, 2022

Karen L. Lessard  
Blackduck District Ranger

Date

## MAP - FIRE DEPENDENT LAND TYPES

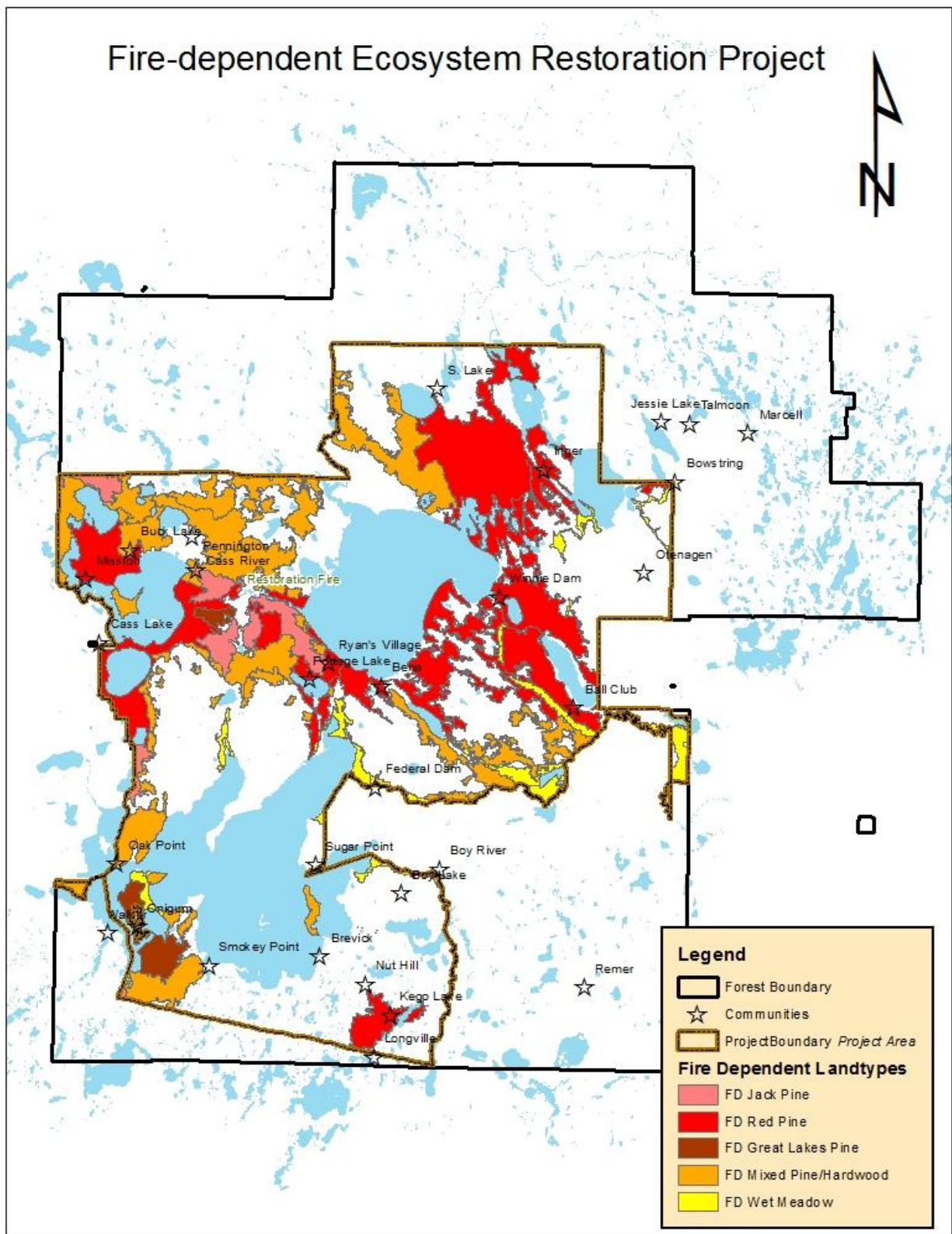


Figure 3: Fire-dependent land types within the project area